

U.S. Environmental Protection Agency
Total Coliform Rule / Distribution System Advisory Committee

1255 – 23rd Street NW, Suite 275
Washington DC 20037

April 9-10, 2008

AGENDA

Meeting Objectives/Desired Outcomes:

- **Discuss options and begin to identify areas of possible agreement for revising the Total Coliform Rule, including rule construct, monitoring provisions, system categories, action levels, investigation and follow-up, and public notification, etc;**
- **Discuss purpose, timetable, priorities and coordination mechanisms for research and information collection concerning distribution systems; and**
- **Discuss topics for upcoming TCRDSAC meetings.**

Wednesday, April 9, 2008

8:30-9:00 Arrival

9:00-9:20 Welcome, Introductions, Meeting Objectives and Agenda
Objective: Review desired outcomes, agenda and materials for this meeting.

9:20-10:00 Presentation I and Discussion: Background Information Related to Options Review
Objective: Provide overview of technical presentations for this meeting. Present information requested at the last meeting and assumptions made for comparing variations among possible recommendations for revising the TCR.

Doug Owen and Vanessa Speight, Malcolm Pirnie [20 min]

Discussion [20 min]

– Clarification questions

10:00-10:45 Presentation II and Discussion: Results of Analysis for the Current Total Coliform Rule (as written and as implemented)
Objective: Understand best estimates of the number and percent of systems by category that are likely to be triggered by the provisions of the current TCR, population affected, distribution of types of actions that are taken, and cost. [NOTE: This analysis is meant as a baseline for comparison to possible revisions to the rule, so most discussion is assumed to follow presentations III and IV.]

Doug Owen and Vanessa Speight, Malcolm Pirnie [20 min]

Discussion [25 min]

– Clarification questions

– Implications/questions this suggests for later discussion

10:45-11:00 Break

11:00-12:15 Presentation III and Discussion: Results of Varying the Baseline and Reduced Monitoring Provisions Assuming a Treatment Technique Approach

Objective: Assuming the current rule provisions concerning a non-acute violation becomes an action level, understand best estimates of the number and percent of systems by category that are likely to be triggered to an investigation under different monitoring provision options. In addition, learn about variations in the population affected, costs and other factors.

[NOTE: This analysis is intended to provide a first, broad comparison of a new treatment technique rule construct to the current MCL-based rule construct. The provisions to define such a rule construct used for this analysis were those discussed at the February meeting. This analysis then compares various monitoring provisions within that rule construct. The monitoring concepts compared are drawn from the current TCR and February's option 2 and option 3b.]

Vanessa Speight, Malcolm Pirnie [30 min]

Discussion [45 min]

- Clarification questions
- What are the pros and cons of these different monitoring provisions?
- Which of these monitoring provisions should continue to be considered?
Are there any other variations in the monitoring requirements that should be considered?
- What else can be learned from this analysis?

12:15-1:30 Lunch (on your own, time for caucuses)

1:30-2:30 Presentation IV and Discussion: Results of Varying the Approaches to Investigation and Corrective Action Assuming a Treatment Technique Approach

Objective: Assuming the non-acute violation in the current TCR becomes an action level, understand the impacts of varying the investigation and corrective action provisions of the rule.

Vanessa Speight, Malcolm Pirnie [15 min]

Discussion [45 min]

- Clarification questions
- What are the pros and cons of these different investigation provisions?
- Which of these provisions should continue to be considered? Are there any other variations that should be considered?
- What else can be learned from this analysis?

- 2:30-3:30 Discussion: Additional Analyses for May Meeting
Objectives: Review the provisions for system categories, reduced monitoring thresholds, reduced monitoring frequencies, repeat monitoring, action triggers, etc. assumed in the analysis above. Decide whether to analyze variations in those provisions and, if so, what the alternatives for comparison should be.
- 3:30-3:45 Break
- 3:45-4:00 Presentation: SBREFA Report
Objectives: Learn about recommendations from the SBREFA panel.
- 4:00-5:00 Discussion: Other Proposed Rule Provisions
Objectives: Discuss some of the following issues (others will carry over to the May meeting):
- *provisions for transition from current TCR to a new rule*
 - *criteria and elements for sample siting plans, and whether they should be reviewed or approved by state*
 - *threshold for returning to baseline monitoring and timing/approach for renewed eligibility for reduced monitoring*
 - *timing for completing an investigation and corrective action, and whether it varies under different circumstances (e.g. for action level trigger versus acute violation)*
 - *under what circumstances can investigation provisions be considered satisfied when no cause for the action level exceedances was found*
 - *violations and public notification requirements*
 - *seasonal systems*
 - *operator training, etc*
 - *other*
- 5:00-5:30 Discussion: Application of Public Health Concepts to Distribution System Protection
Objective: Review possible applicability of Institute of Medicine concepts associated with assessment, policy development and assurance. Which concepts could be incorporated into recommendations for revision of the TCR and which are more applicable to recommendations for future research and information collection?
- 5:30-6:00 Public Comment

Thursday, April 10, 2008

- 8:00-8:30 Arrival
- 8:30-8:45 Review Today's Agenda
Objective: Reflections on Day One discussions and review desired outcomes, agenda and materials for this meeting. Review and approve January and February meeting summaries.

- 8:45-9:15 Discussion: Context for Information Collection and Research Recommendations
Objectives: Discuss basis for recommendations, e.g. review the charge and Committee's understanding concerning implications for the purposes or uses of the information/research, timeframe and resource limitations, etc. [Mechanisms for ongoing coordination will be discussed after presentation of proposed priorities.]
- Discussion:
- Purposes for the information and research
 - Timeframe and resources
- 9:15-10:30 Presentation V and Discussion: Information Collection and Research Priorities
Objectives: Review priority rankings by the TWG (with the criteria that informed the ranking) of knowledge gaps for the seven issue areas identified by the Committee at its January meeting. Discuss how knowledge gaps relate to the purposes or uses of the information/research, e.g. what decisions could be made after these gaps were filled that can't be made now. Decide some or all knowledge gaps to include in the draft agreement in principle and/or identify next steps to complete recommendations.
- Gary Burlingame, Philadelphia Water and Sean Conley, U.S. EPA [15 min]
- Discussion: [60 min]
- Clarification questions
 - Relationship of knowledge gaps to purposes identified
 - Priorities to include in draft agreement in principle based on discussion
 - Next steps to complete recommendations about priorities
- 10:30-10:45 Break
- 10:45-12:00 Discussion: Implementation Mechanisms for Information Collection and Research
Objective: Discuss possible approaches for implementing the information collection and research needs recommendations, including time table, roles, approaches, etc.
- 12:00-1:15 Lunch (on your own)
- 1:15-2:45 General Discussion
Objective: Discuss additional topics concerning either element of the charge, as needed. Also discuss the structure of and approach/timing for drafting the agreement in principle document, and implications for remaining three meetings.
- 2:45-3:00 Recap and Discuss Next Steps
Objective: Summarize decisions made and discuss next steps for May meeting.
- 3:00 Adjourn

NOTE: This draft agenda was prepared by the facilitators for review by the Total Coliform Rule Distribution System Advisory Committee. The Total Coliform Rule Distribution System Advisory Committee is a federal advisory committee chartered by Congress, operating under the Federal Advisory Committee Act (FACA; 5 U.S.C., App.2). The committee provides advice to the Administrator of the U.S. Environmental Protection Agency on revisions to the Total Coliform Rule (TCR), and on what information about distribution systems is needed to better understand the public health impact from the degradation of drinking water quality in distribution systems. The findings and recommendations of the Committee do not represent the views of the Agency, and this document does not represent information approved or disseminated by EPA.